

1 **BORJA_A.dep**

2 LEONARDO M. RAPADAS
United States Attorney
3 JESSICA F. CRUZ
Assistant U.S. Attorney
4 MIKEL W. SCHWAB
Assistant U.S. Attorney
5 Sirena Plaza, Suite 500
108 Hernan Cortez Avenue
6 Hagåtña, Guam 96910-5059
TEL: (671) 472-7332
7 FAX: (671) 472-7334

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 vs.
13 ALEX SAN NICOLAS BORJA,
14 Defendant.
15

CRIMINAL CASE NO. 99-00047

NOTICE OF INTENTION TO TAKE
ORAL DEPOSITION WITH
SUBPOENA DUCES TECUM

16 TO: Alex S.N. Borja
17 c/o P.O Box XXXXXX
18 Saipan, MP 96950

19 Please take notice that the United States of America, the plaintiff and judgment creditor
20 herein, will on May 19, 2008 take oral deposition of defendant, ALEX SAN NICOLAS BORJA,
21 in the above styled and number case pursuant to Rules 30 and 69(a) of the Federal Rules of Civil
22 Procedure and in aid of collecting its judgment.

23 Said deposition will take place at the offices of the United States Attorney, 3rd Floor,
24 Horiguchi Building, Garapan, Saipan, MP at 10:00 a.m. on May 19, 2008 and will continue until
25 completed. Said deposition will be taken before a Certified Court Reporter and will be taken
26 upon oral examination for the purpose of discovery or as evidence or both pursuant to the
27 Federal Rules of Civil Procedure.

28 //

1 Notice is hereby further given that at this deposition defendant, ALEX SAN NICOLAS
2 BORJA, is hereby required to produce all documents described in the accompanying
3 Schedule A.

4 DATED, this 7th day of March, 2008.

5
6 LEONARDO M. RAPADAS
7 United States Attorney
8 Districts of Guam and the NMI

9 By: /s/ Jessica F. Cruz
10 JESSICA F. CRUZ
11 Assistant U.S. Attorney
12 Jessica.F.Cruz@usdoj.gov
13 MIKEL W. SCHWAB
14 Assistant U.S. Attorney
15 mikel.schwab@usdoj.gov
16
17
18
19
20
21
22
23
24
25
26
27
28

SCHEDULE A TO NOTICE OF INTENT TO TAKE
ORAL DEPOSITION WITH SUBPOENA DUCES TECUM

1. Full and complete copies of your income tax returns for the past three (3) years filed by you or any business in which you owned an interest, or evidence of request to Department of Revenue and Taxation for filing of extension.
2. Earnings statements from your twelve (12) most recent pay checks.
3. Business records for the present year and past calendar or tax year which reflects assets, liabilities, contingent liabilities, gross receipts and expenses for any sole proprietorship, partnership or corporation in which you or your spouse owns any interest.
4. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where any sole proprietorship, partnership or corporation in which you or your spouse owns any interest has an account of any kind.
5. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where you or your spouse have an account of any kind.
6. All trust agreements in which you or your spouse are named settlor, trustee, or beneficiary.
7. All deeds, leases, contracts, and other documents evidencing encumbrances of any kind on real property owned by you or in which you or your spouse have any ownership interest.
8. All deeds of trusts, mortgages, or other documents evidencing encumbrances of any kind on real property owned by you or in which you or your spouse have any ownership interest.
9. A listing of all stock, bonds, or other securities of any class you own separately or jointly with others, including options to purchase any securities and the actual instruments if in your possession.
10. Current brokerage statements for the past twelve (12) months from any stock brokerage firm or similar entity where you or your spouse have an account of any kind.
11. Title to any motor vehicle owned by you or your spouse.
12. All life insurance policies in which you are either the insured or the beneficiary.
13. All promissory notes held by you, and all other documents evidencing any money owed to you either now or in the future.
14. All financial statements prepared by or for you in the last twelve (12) months and an updated verified Department of Justice financial statement (OBD 500) not more than sixty (60) days old (attached hereto).
15. All deeds, titles, bills of sale, or other documents prepared in connection with any transfer of real or personal property made with you, either by gift, sale, or otherwise in the last twelve (12) months.
16. A schedule of all regular expenses paid by you, such as installment debts, food, utilities, etc. Include the amount paid, the payee, and, if an installment debt, the amount of the debt owing and any security pledged.
17. All documents evidencing any interest you have in any pension plan, retirement fund, or profit sharing plan.
18. A certified copy of any divorce decree granted to you, plus a copy of any property settlement resulting from said divorce, including alimony and child support agreements or orders.

Perez, Michelle (USAGU)

From: ecf-nmid@nmid.uscourts.gov
Sent: Saturday, March 08, 2008 11:13 AM
To: ecf-nmid@nmid.uscourts.gov
Subject: Activity in Case 1:99-cr-00047 United States of America v. Mundo Notice (Other)

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

U.S. District Court

Northern Mariana Islands

Notice of Electronic Filing

The following transaction was entered by Cruz, Jessica on 3/8/2008 at 11:13 AM GMT+10 and filed on 3/8/2008

Case Name: United States of America v. Mundo

Case Number: 1:99-cr-47

Filer:

Document Number: 154

Docket Text:

NOTICE of Intention to Take Oral Deposition with Subpoena Duces Tecum by Alex San Nicolas Borja (Cruz, Jessica)

1:99-cr-47-3 Notice has been electronically mailed to:

David G. Banes dbanes@saipan.com, attorneys@saipan.com

Marivic P. David Marivic.David@usdoj.gov, Michelle.Perez@usdoj.gov

1:99-cr-47-3 Notice will be delivered by other means to:

Cindy Adams
Law Office of Brian McMahon
P.O. Box 501267
Saipan, MP 96950

Paul A. Lawlor
AAA-741 P.O. Box 10,001
Saipan, MP 96950

Steven P Pixley
2nd Floor, CIC Centre
P.O. Box 7757 SVRB
Saipan, MP 96950

David T Wood
Horiguchi Bldg, 3rd Floor
P.O. Box 50377
Saipan, MP 96950

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1107461626 [Date=3/8/2008] [FileNumber=29017-0] [362e0021117aa4f107eaea5ecdb81d7f4a7aa3d68403f5c8fabf7770b545399929cf18610e18d9e09ff043eb73a9636bd8ba522db56004dfd79dd091f82b06c5]]